

PERMIT NO. 5031-311-0018-S-01-0
ISSUANCE DATE:



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: White County Mouldings
Facility Address: 176 Appalachian Trail Dr.
Cleveland, Georgia 30528 White County
Mailing Address: 176 Appalachian Trail Dr.
Cleveland, Georgia 30528
Facility AIRS Number: 04-13-311-00018

is issued a Permit for the following:

Operation of a sawmill for the manufacture of rough and dimensional lumber. This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28161 dated October 25th, 2021; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 8 pages.



Richard E. Dunn, Director
Environmental Protection Division

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 1 of 8

1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall operate the multiclone (ID No. MC1), cyclones (ID Nos. CYA and CYB), and filters (ID Nos. BHA, BHB, and BHC) at all times while the associated emission units are in operation.
[Title V Avoidance]
- 2.2 The Permittee shall process hardwood and manufacture hardwood lumber only.
[391-3-1-.03(2)(c)]
- 2.3 The Permittee shall fire only wood in the wood-fired boiler (ID No. B1).
[391-3-1-.03(2)(c); 391-3-1-.02(g)2. (subsumed); 40 CFR 63.11200(b)]

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 2 of 8

- 2.4 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart A – “General Provisions,” and 40 CFR 63 Subpart JJJJJ – “National Emissions Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial and Institutional Boilers,” for the operation of the wood-fired boiler (ID No. B1).
[40 CFR 63 Subpart A and Subpart JJJJJ]
- 2.5 The Permittee shall not cause, let, suffer, permit, or allow any emissions, from any manufacturing process that produces visible emissions, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]
- 2.6 The Permittee shall not cause, let, suffer, permit, or allow any emissions from any fuel burning equipment which:
- a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from the equation noted below:
[391-3-1-.02(2)(d)2.(ii)]
- $$P = 0.5(10/R)^{0.5}$$
- Where P equals the allowable PM emission rate in pounds per million BTU and R equals the heat input in millions BTU per hour.
- b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six-minute period per hour of not more than 27 percent opacity.
[391-3-1-.02(2)(d)3.]
- 2.7 The Permittee shall not cause, let, suffer, permit, or allow the emission from any manufacturing processes which contains particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit:
[391-3-1-.02(2)(e)1.(i)]
- a. $E = 4.1 * P^{0.67}$; for process input weight rate up to and including 30 tons per hour.
- b. $E = 55 * P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

Where: E = allowable emission rate in pounds per hour;
P = process input weight rate in tons per hour.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 3 of 8

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust and sawdust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)]
- a. Use, where possible, of water or chemicals for control of dust from all sources at the facility that is subject to this regulation including but limited to: the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
 - d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
 - e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.
- 4.2 The Permittee shall maintain an inventory of baghouse filter bags such that an adequate supply of bags is on hand to replace any defective ones.
- 4.3 The Permittee shall operate and maintain the boiler (ID No. B1), including the associate air pollution control equipment and associate monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
[40 CFR 63.11205(a)]

5. Monitoring

- 5.1 Any monitoring system or device installed by the Permittee shall be in continuous operation except during calibration checks, zero and span adjustments or periods of repair. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 4 of 8

- 5.2 Within 120 days of the effective date of this permit or the initial startup of the resumed operation of the facility, whichever comes later, the Permittee shall conduct an initial performance tune-up of the wood-fired boiler (ID No. B1) in accordance with the procedures described in Condition No. 5.3 of this permit. The Permittee shall submit to the Division a signed statement in the Notification of Compliance Status report outlined in Condition 7.1 of this permit, certifying that the initial tune-up has been conducted.
[391-3-1-.02(6)(b)1.; 40 CFR 63.11214(b); and Item 6. of Table 2 to 40 CFR 63 Subpart JJJJJ]
- 5.3 Following the initial performance tune-up conducted in accordance with Condition 5.2, the Permittee shall conduct a performance tune-up of the wood-fired boiler (ID No. B1) biennially. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The biennial tune-up shall include the following:
[391-3-1-.02(6)(b)1.; 40 CFR 63.11223(a) and (b); and Item 6. of Table 2 to 40 CFR 63 Subpart JJJJJ]
- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the Permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
 - d. Optimize total emissions of carbon monoxide (CO). This optimization should be consistent with the manufacturer's specifications, if available.
 - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
 - f. Maintain onsite and submit, if requested by the Division, a report containing the following information:
 - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 5 of 8

- iii. The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.
 - g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.
- 5.4 The Permittee shall perform a check of visible emissions from all baghouses (ID Nos. BHA, BHB, and BHC). The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal. The check shall be conducted at least once for each day or portion of each day of operation using procedures a through c below except when scheduling, atmospheric conditions or sun positioning prevent any opportunity to perform the daily VE check. Scheduling prevents a daily VE check only when an emission unit is not operating during a regularly scheduled time period established for the daily VE checks.
[391-3-1-.02(6)(b)1.]
- a. Determine, in accordance with the procedures specified in paragraph c of this condition, if visible emissions are present at the discharge point to the atmosphere from each of the sources and record the results in the daily (VE) log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b of this condition.
 - b. For each source that requires action in accordance with paragraph a of this condition, the Permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the maintenance log.
 - c. The person performing the determination shall stand at a distance of at least 15 feet which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.
- 5.5 The Permittee shall install, calibrate, maintain, and operate a differential pressure indicator on each of the multiclone (ID No. MC1), cyclones (ID Nos. CYA and CYB), and filters (ID Nos. BHA, BHB, and BHC) to measure the pressure drop across each of the control devices. Data shall be recorded for each day the associated emission unit or process is in operation.
[391-3-1-.02(6)(b)1.]

The Permittee shall ensure that the multiclone (ID No. MC1) is operated at a pressure drop at or above the minimum pressure drop established in accordance with Condition 6.4. The Permittee shall also ensure that all the other control devices are operated within the pressure drop range recommended by the vendor.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 6 of 8

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
 - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test and shall provide with the notification a test plan in accordance with Division guidelines.
 - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.
- 6.2 Within 180 days of the effective date of this permit or the initial startup of the resumed operation of the facility, whichever comes later, the Permittee shall conduct the initial performance tests for particulate matter (PM) on Boiler B1, in order to demonstrate compliance with the emissions limitations contained in Condition 2.6a.
[391-3-1-.02(6)(b)1.]
- 6.3 The Permittee shall repeat the PM performance tests specified in Condition 6.2 according to the following schedule:
[391-3-1-.02(6)(b)1.]
- a. Subsequent performance test must be conducted on a biennial basis, except as specified in Paragraphs b. and c. of this Condition. Biennial performance tests must be completed no more than 25 months after the previous performance test.
 - b. If any test results are below 50 percent of the emission limit specified in Condition 2.6a., the Permittee may choose to conduct the PM performance test at 48-month intervals (no more than 49 months after the previous test).
 - c. If a performance test shows PM emissions at or above 50 percent of the emission limit specified in Condition 2.6a., the Permittee shall resume the biennial PM performance testing schedule.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 7 of 8

- 6.4 The Permittee shall establish a minimum pressure drop across the multicclone (ID No. MC1) during the most recent performance test specified in Conditions 6.2 and 6.3.
[391-3-1-.02(6)(b)1.]

7. Notification, Reporting and Record Keeping Requirements

- 7.1 Within 120 days of the effective date of this permit or the initial startup of the resumed operation of the facility, whichever comes later, the Permittee must submit to the Division a Notification of Compliance Status, signed by a responsible official who shall certify its accuracy, with the certification of compliance statement below.
[391-3-1-.02(6)(b)1. and 40 CFR 63.1225(a)(2) and (a)(4)]

- a. “This facility complies with the requirements of Condition 5.2 to conduct an initial tune-up of Boiler B1.”
- b. “This facility has had an energy assessment performed on Boiler B1 according to 40 CFR 63.11214(c).”

The notification must also be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx).

- 7.2 The Permittee shall prepare and submit to the Division by March 1 of each biennial period a compliance certification report for Boiler containing the following information:
[391-3-1-.02(6)(b)1. and 40 CFR 63.11225(b)]

- a. Company name and address.
- b. Statement by a responsible official, with the official’s name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63, Subpart JJJJJ. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - i. “This facility complies with the requirements in Condition 5.3 to conduct a biennial tune-up of Boiler B1.”

- 7.3 The Permittee shall maintain the records for Boiler B1 as specified below.
[391-3-1-.02(6)(b)1. and 40 CFR 63.11225(c)]

- a. As required in 40 CFR 63.10(b)(2)(xiv), the Permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.

**State of Georgia
Department of Natural Resources
Environmental Protection Division**

**Permit No.
2421-311-0018-S-01-0**

Page 8 of 8

- b. The Permittee shall keep records to document conformance required by 40 CFR 63.11214 and 40 CFR 63.11223 as specified below.
 - i. Records must identify the boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - ii. A copy of the energy assessment report.
- c. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- d. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal use or usual manner of operation.

Records must be in a form suitable and readily available for expeditious review. Each record must be kept for 5 years following the date of each recorded action. The Permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The Permittee may keep the records off site for the remaining 3 years.

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."